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 131145-0105

September 30, 2022

**Via ECF**

Hon. Alvin K. Hellerstein  
 United States District Court  
 Southern District of New York  
 500 Pearl Street  
 New York, NY 10007

Re: *In re Novartis and Par Antitrust Litigation*,  
 Case No. 1:18-cv-04361

Dear Judge Hellerstein,

I am an attorney with the law firm Foley & Lardner LLP, counsel for non-party Caremark PHC, LLC (“Caremark”) in the above-referenced proceeding. I respectfully request that the Court approve my and my firm’s withdrawal as counsel of record for non-party Caremark.

Caremark appeared in this action in July 2020 solely in connection with a motion (ECF 259) to compel compliance with a subpoena. The dispute over the scope of the subpoena was subsequently resolved, the motion was withdrawn, *see* ECF 275, and discovery in the matter has since closed. The basis for Caremark and its counsel’s appearance in this proceeding therefore has long since been resolved and concluded. Additionally, I will be leaving Foley & Lardner LLP on October 3, 2022.

The requested withdrawal will not cause or result in any delay or prejudice to any party, nor is my firm asserting any retaining or charging lien.

Accordingly, withdrawal is appropriate under Local Rule 1.4. Attached for Your Honor’s consideration please find a Proposed Order granting my withdrawal as counsel of record for non-party Caremark.

Respectfully,

*s/ Rachel E. Kramer*

Rachel E. Kramer

cc: All counsel of record (via ECF)

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